

**From:** [Granger, Michelle](#)  
**To:** [Bruce S Kennington](#)  
**Subject:** Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call  
**Date:** Monday, August 20, 2018 12:14:52 PM

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Hi, Bruce-

Yes, please send out invite. Thank you for proposed agenda.

Best,

Michelle-

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**From:** Bruce S Kennington <bkennington@ramboll.com>

**Sent:** Monday, August 20, 2018 9:53:54 AM

**To:** Granger, Michelle

**Cc:** Hidalgo, Luis (G&I)

**Subject:** RE: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Dear Michelle:

On behalf of Luis Hidalgo (Rio Tinto), Project Coordinator for OU3, we propose to have our call tomorrow on **Tue, Aug 21<sup>st</sup> at 1:30 Eastern** (12:30 PM Central / 11:30 PM Mountain) Time. I will send out a calendar appointment reminder with WebEx dial-in information to you next with copy to Kim O'Connell, Frances Zizila, and the USACE representatives.

To guide our discussion on this call a proposed agenda is below.

- I. Locations of USEPA proposed additional soil borings (north of PDI-SB25 and south of PDI-SB26).
- II. PPPI/Rio Tinto efforts to secure an earlier date for additional PDI soil borings during Albéa plant operation.
- III. Review of proposed soil boring locations for installation during the scheduled Albéa plant shutdown (Dec 24 to Jan 1).
- IV. Path Forward: Project Time Schedule and preparation of Remedial Design Submittals.
- V. Q&A / Action Items

We will be prepared to put site figures and images on the screen to display during our call, so please ask folks to connect via the internet for the visual portion of the presentation.

Sincerely,

**Bruce S Kennington**

Principal

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M +1 (312) 953-9965

[bkennington@ramboll.com](mailto:bkennington@ramboll.com)

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**From:** Granger, Michelle [mailto:Granger.Michelle@epa.gov]

**Sent:** Thursday, August 16, 2018 12:53 PM

**To:** Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>

**Cc:** Bruce S Kennington <bkennington@ramboll.com>

**Subject:** Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Hi, Luis-

Can we set a call up for Tuesday, 8/21 at 1pm or 1:30pm? Please send invite to usual folks and please add Frances Zizila ([Zizila.Frances@epa.gov](mailto:Zizila.Frances@epa.gov)). Kim is not available next week, but please send her the invite as well.

Thank you!  
Michelle-

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**From:** Hidalgo, Luis (G&I) <[Luis.Hidalgo@riotinto.com](mailto:Luis.Hidalgo@riotinto.com)>

**Sent:** Wednesday, August 15, 2018 1:16 PM

**To:** Granger, Michelle

**Cc:** Bruce S Kennington

**Subject:** Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Thanks for the update Michelle.

We can be generally available Tue (before 10:30 am est or after 12 pm est) or Wed next week for a call with USEPA.

Luis Hidalgo

Sent from my iPad

On Aug 15, 2018, at 7:47 AM, Granger, Michelle <[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)> wrote:

Hi, Luis-

This week is not looking good for the call. I'm looking into next Tues. or Wed. morning. Please let me know your availability. I'm checking with my team as well.

Thank you!

Michelle-

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**From:** Hidalgo, Luis (G&I) [<mailto:Luis.Hidalgo@riotinto.com>]

**Sent:** Tuesday, August 14, 2018 4:28 PM

**To:** Granger, Michelle <[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)>

**Cc:** Bruce S Kennington <[bkennington@ramboll.com](mailto:bkennington@ramboll.com)>

**Subject:** Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Michelle,

Clarifying for Thu options: a call on Thu before [10:30 AM ET](#) or after [2:00 PM ET](#) would work for us.

Thanks,

Luis Hidalgo

Sent from my iPad

On Aug 14, 2018, at 2:21 PM, Hidalgo, Luis (G&I) <[Luis.Hidalgo@riotinto.com](mailto:Luis.Hidalgo@riotinto.com)> wrote:

Yes. Thu should work.

Thanks,

Luis Hidalgo

Sent from my iPhone

On Aug 14, 2018, at 2:18 PM, Granger, Michelle  
<[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)> wrote:

Hi, Luis-

Thank you for your patience. I'm checking on availability for tomorrow morning and Thursday with the USACE. If tomorrow doesn't work out, does Thursday work for you?

Best,

Michelle-

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**From:** Hidalgo, Luis (G&I)

[<mailto:Luis.Hidalgo@riotinto.com>]

**Sent:** Tuesday, August 14, 2018 4:07 PM

**To:** Granger, Michelle <[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)>

**Cc:** Bruce S Kennington <[bkennington@ramboll.com](mailto:bkennington@ramboll.com)>

**Subject:** Fwd: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Michelle, looking forward to a confirmation time for the meeting. Alternatively, please let us know if another day is preferred by you and your team.

Luis Hidalgo

Sent from my iPhone

**From:** "Granger, Michelle"

<[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)>

**Date:** August 13, 2018 at  
12:08:49 PM CDT

**To:** Bruce Kennington

<[bkennington@ramboll.com](mailto:bkennington@ramboll.com)>

**Subject: Fw: Pohatcong OU3 -  
PDI Next Steps Proposal  
presented on the 7/2/18 call**

Hi, Bruce-

I'll check availability for Wed. with USACE. I'll keep you posted. If anything has changed and you are thinking of a different day, please let me know.

Thank you!

Michelle-

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**From:** Hidalgo, Luis (G&I)

<[Luis.Hidalgo@riotinto.com](mailto:Luis.Hidalgo@riotinto.com)>

**Sent:** Thursday, August 9, 2018

4:17 PM

**To:** Granger, Michelle

**Cc:** Bruce Kennington; Oconnell,  
Kimberly; Zizila, Frances

**Subject:** RE: Pohatcong OU3 -

PDI Next Steps Proposal

presented on the 7/2/18 call

Dear Michelle,

Thanks for EPA's feedback and  
comments.

We're proposing to have a  
conference call next

Wednesday (Aug 15) to discuss  
the feasibility of additional  
boreholes prior to the

December shutdown, as well as  
technical limitations of such  
equipment and design timeline  
commitment. We'll have

responses to your email below  
to be discussed during the call.

Bruce will schedule the call, at a  
time that suits you and your  
team.

Regards,

Luis Hidalgo

Project Manager, Principal  
Advisor

**Rio Tinto**

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UT 84009

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3965

[luis.hidalgo@riotinto.com](mailto:luis.hidalgo@riotinto.com)

<http://www.riotinto.com/>

cid:image001.png@01D429BC.BD870540

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**From:** Granger, Michelle

<[Granger.Michelle@epa.gov](mailto:Granger.Michelle@epa.gov)>

**Sent:** Thursday, August 9, 2018

11:06 AM

**To:** Hidalgo, Luis (G&I)

<[Luis.Hidalgo@riotinto.com](mailto:Luis.Hidalgo@riotinto.com)>

**Cc:** Bruce Kennington

<[bkennington@ramboll.com](mailto:bkennington@ramboll.com)>;

Oconnell, Kimberly

<[OConnell.Kim@epa.gov](mailto:OConnell.Kim@epa.gov)>;

Zizila, Frances

<[Zizila.Frances@epa.gov](mailto:Zizila.Frances@epa.gov)>

**Subject:** Pohatcong OU3 - PDI

Next Steps Proposal presented  
on the 7/2/18 call

Dear Luis,  
EPA has reviewed the PDI  
next steps slides and  
proposal discussed on our  
technical call on 7/2/18.  
EPA has two issues with  
the PDI proposal presented  
on the call:

**1. Scope of the PDI -**

EPA believes further  
delineation to the north  
of PDI-SB25 and to the  
south of PDI-SB26 is still  
necessary. Both PDI-SB25  
and 26 were installed  
within the hallway  
parallel to the molding  
room, outside the  
manufacturing area. Our  
understanding is that  
installation of those  
borings did not require  
shutdown. For that reason,

we would like to know whether two additional borings (see figure attached) can be installed to the north and south of PDI-SB25 and 26, respectively, now while the Albea plant is in operation? These two additional borings are needed in addition to the proposed borings within the manufacturing area to determine the extent of contamination and treatment area.

## **2. Schedule of the Project**

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The OU3 Preliminary Design Report (30% design) is scheduled to be submitted in September 2018. Under paragraph 12 of the Consent Decree and Section VI.C.4, the 30% RD report is to contain the results of the PDI sampling. EPA had expected that all of the results of the PDI would be included in the 30% RD report.

During our technical call with PPPI/Rio Tinto on Monday, July 2nd, EPA was informed that additional sampling needed for the PDI in the manufacturing area adjacent to the molding room is not scheduled for another 5 months until the end of December 2018 when the Albea plant will be shut down for a period of time. Absent additional information from PPPI/Rio Tinto documenting their efforts to secure an earlier date for this sampling from Albea as well as the reasons that an earlier date is not possible, EPA does not consider the December sampling date to be reasonable. The two additional borings mentioned in item #1, the ones north and south of PDI-25 and PDI-26 could be done now, while the plant is in operation; therefore, EPA does not see a reason for delaying those two borings. In addition, in an effort to complete the proposed borings sooner, PPPI/Rio Tinto should consider other options, including using two rigs to obtain the soil borings in a shorter period of time which would reduce the

impact to Albea's operations. Obtaining the results of the soil borings sooner than December 2018 will enable those results to be presented in the 90% Design Report to be submitted to EPA in January 2019 and will build in extra time in case those results require stepping out for additional sampling. It is very important to EPA that the final RD report is completed by February 28, 2019 so that this project remains on schedule. Please feel free to contact me if you have any questions.  
Sincerely,  
Michelle Granger, EPA RPM  
212-637-4975

<image001.gif>